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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8
9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 v.
12 TORI MANGUM,
13 Defendant.

Case No. 2:22-cr-50-APG-MDC

**STIPULATION TO CONTINUE
SENTENCING**
(First Request)

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15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United
16 States Attorney, and David Kiebler, Assistant United States Attorney, counsel for the United
17 States of America, and Yi Lin Zheng, counsel for Tori Mangum, that the sentencing set for
18 October 30, 2024, be vacated and set to a date and time convenient to this Court, but no sooner
19 than forty-five (45) days.

20 The Stipulation is entered into for the following reasons:

- 21 1. Defense counsel needs additional time to edit a sentencing mitigation memo,
22 draft objections to the PSR, and prepare a sentencing memo.
23 2. The defendant does not object to the continuance.
24 3. The parties agree to the continuance.
25 4. The additional time requested herein is not sought for purposes of delay, but
26 merely to allow counsel for defendant sufficient time within which to be able to effectively and
complete investigation of the discovery materials provided.

1 This is the first stipulation to continue filed herein.

2 DATED: October 22, 2024.

3 By /s/ Yi Lin Zheng
4 Yi Lin Zheng
Counsel for Tori Mangum

JASON FRIERSON
United States Attorney

5 By /s/ David Kiebler
6 David Kiebler
7 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TORI MANGUM,

Defendant.

Case No. 2:22-cr-50-APG-MDC

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defense counsel needs additional time to edit a sentencing mitigation memo, draft objections to the PSR, and prepare a sentencing memo.
2. The defendant does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

DATED: October 22, 2024.

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